

DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

BENEDETTO A. CERILLI, JR., :  
Plaintiff : COMPLAINT  
vs. :

CHRISTIANSTED ISLAND HOTELS, LLC. Civil Action No. 2017-019  
DAVID GAYANICH and  
CHRSTOPHER GAYANICH  
Defendants

COMPLAINT

COMES NOW Plaintiff, BENDETTO A. CERILLI, JR., and alleges the following:

COUNT I

1. Plaintiff, Benedetto A. Cerilli, Jr. is a resident of St Croix, USVI.
2. Defendant Christiansted Island Hotels. LLC is a St. Croix limited liability company with offices situated at 5000 Chenay Estates, Christiansted, St. Croix, USVI, hereinafter referred to as the "Company".
3. Defendant Christopher Gayanich is the present Manager of the Company responsible for the operations of all assets of the Defendant Company and is a resident of the State of Oklahoma.
4. Defendant David Gayanich is the grandfather of Defendant Christopher Gayanich and is the de facto manager of the Defendant Company, directing Defendant Christopher Gayanich in all aspects of the operations of the Defendant Company, and is a resident of the State of Oklahoma.
5. Jurisdiction of this Court results from diversity of the parties.
6. Defendant owes the Plaintiff the sum of Four Hundred Fifty Two Thousand Five Hundred (\$452,500.00) Dollars, as Manager of the Defendant's assets, for services in the creation and organization of the Defendant company and for the management and administration of the assets of the Defendant, consisting of a hotel, beach club, time-share sales and service, restaurant, lounge and related services provided to the general public and to Defendant's time share owners, pursuant to the attached invoice attached hereto and entitled "Exhibit A".

7. Services were rendered to Defendant by Plaintiff from May, 2014 to December, 2015, pursuant to the authority of the provisions contained in the operating agreement of the Defendant, at which said time Plaintiff was summarily terminated as the Manager of the Defendant Company and its assets.

8. Plaintiff has made demand the from the Defendant Company for the payment of the outstanding amounts set forth in "Exhibit A" and no amount of payment for the Plaintiff services has been forthcoming.

WHEREFORE, Plaintiff demands judgment against the Defendants in the sum of Four Hundred Fifty Two Thousand Five Hundred (\$452,500.00) Dollars, plus interest, costs and reasonable attorney fees.

COUNT II

9. Plaintiff hereby realleges, affirms and incorporates Paragraphs 1 through 8 of the Plaintiff's Complaint herein.

10. Defendants owe the Plaintiff the sum of Four Hundred Fifty Two Thousand Five Hundred (\$452,500.00) Dollars for the value of management services and administration of the assets of the Defendant Company pursuant to the authority contained in the operating agreement of the Defendant Company from May, 2014 until December, 2015, the date of the Plaintiff's summary discharge as manager of the assets of the Defendant Company.

WHEREFORE, Plaintiff demands judgment against the Defendants in the sum of Four Hundred Fifty Two Thousand Five Hundred (\$452,500.00) Dollars, plus interest, costs and reasonable attorney fees.

BENEDETTO A. CERILLI, JR.

*Benedetto A. Cerilli, Jr.*

ADDRESS:

*22 Skytop Lane*  
*Christiansted St. Croix*

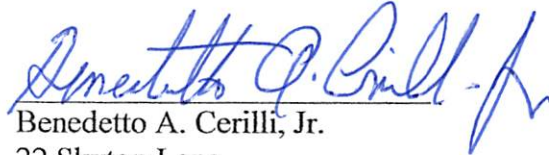
Dated: 3/30, 2017

*P.O. Box 24921*  
*Christiansted*  
*St. Croix, 00824*

AFFIDAVIT

TERRITORY OF THE VIRGIN ISLANDS )  
DIVISION OF ST. CROIX ) SS

I, Benedetto A. Cerilli, Jr. being sworn, deposes and states that I am the Plaintiff in the foregoing action and that I have read and understand the foregoing Complaint, and the same is true to the best of my knowledge.

  
Benedetto A. Cerilli, Jr.

22 Skytop Lane  
Christiansted, St. Croix  
U.S. Virgin Islands

4015696538

DATED: 3/30, 2017

SUBSCRIBED AND SWORN TO  
Before me on this the 30th day of  
MARCH, 2017.

  
Sara Y. Santos  
Notary Public of St. Croix, USVI  
My Commission Expires December 21, 2017  
No. NP-108-13

